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**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

FEB 25 2003

FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Amendment of Section 73.202(b)	)	MB Docket No. 02-382
Table of Allotments	)	RM-10615
FM Broadcast Stations		
(Bridgeton and Pennsauken, New Jersey)	)	

To: Chief, Audio Division

**ADDITIONAL COMMENTS OF WEST WINDSOR PLAINSBORO SCHOOL DISTRICT**

**I. INTRODUCTION**

West Windsor Plainsboro Regional School District ("WWP"), pursuant to Section 1.415 of the rules of the Federal Communications Commission ("Commission"), 47 C.F.R. § 1.415, hereby submits these additional comments ("Comments") in response to the Notice of Proposed Rulemaking ("Notice") issued by the Audio Division ("Division") in the above-captioned proceeding

In our previous filing, we mentioned the detrimental effects the proposed relocation to Pennsauken, New Jersey of channel 300A will have on non-commercial educational station WWPH. We have received an engineering study of the proposed broadcast facility and its effect on WWPH, which we have attached to this submission.

**II. THE COMMISSION SHOULD PROMPTLY DENY THE PETITION TO AMEND THE FM BROADCAST TABLE OF ALLOTMENTS BECAUSE THE PROPOSED REALLOTMENT DOES NOT SERVE THE PUBLIC INTEREST**

The Commission cannot modify an FM allocation unless such reallocation **is** in the public interest. CBC-NJRP's petition **fails** to include WWPH in their channel spacing study. **An** analysis of the proposed operation on channel **300A** in Pennsauken, as indicated in the attached engineering exhibit, indicates that while the protected 60 dBu contour of this station will not receive interference from the presently licensed WWPH operation, WWPH's service area will reside completely with the 40 dBu contour of the proposed Class **A** station. If CBC-NJRP's proposed change is adopted, WWPH's ability to serve its city of license, Princeton Junction, will be severely compromised. In turn, WWPH's ability to offer students hands-on opportunities in local broadcasting also will be compromised.

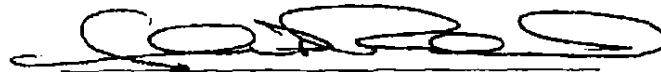
**III. CONCLUSION**

Based on the attached engineering study, WWP again respectfully requests that the Division deny Cohanzick Broadcasting Corporation's and New Jersey Radio Partners' Petition and refrain from mending the FM Broadcast Allocation Table to substitute and relocate Channel 299B to Channel 300A in Pennsauken, New Jersey.

Respectfully submitted,

**WEST WINDSOR PLAINSBORO REGIONAL  
SCHOOL DISTRICT**

2/25/03



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**West Windsor Plainsboro Regional School**  
**WWPH (FM) Princeton Junction, New Jersey**  
**Channel 300D 0.017 KW 11.0 M HAAT**

This engineering statement was written on behalf of the West Windsor Plainsboro Regional School, licensee of FM Educational Station WWPH, Princeton Junction, New Jersey. WWPH operates on channel 300D, 107.9 MHz, with an effective radiated power of 0.017 KW with an HAAT of 11.0 meters, as described in FCC File Number BLED-19800422AA and bears FCC Facility ID number 71694.

On December 16, 2002, the Commission released a Notice of Proposed Rule Making in MB Docket No. 02-382, which proposes to allot channel 300A to Pennsauken, New Jersey. WWPH operates as a Class D (Secondary) station on channel 300.

The map which accompanies this statement was drawn according to methods described in the Commission's Rules. This map shows the location of the protected service 60 dBu F(50:50) contour and the 40 dBu F(50:10) interfering contour of the proposed channel 300A allotment. Also shown are the 60 dBu contour and the 40 dBu interfering F(50:10) contour of WWPH. These WWPH contours are easily identified by their smaller size. In each case, the inner contour is the 60 dBu contour and the outer contour is the 40 dBu contour.

The contours for the Proposed Allotment were based on maximum facilities for a class A station, and are determined for the coordinates found in MB Docket 02-382.

As shown on the map, the WWPH operation does not cause predicted interference to the new class A proposal if the proposed facility is built on or near the coordinates in the petition to amend the table of allotments.

The smaller contours belong to WWPH. The inner is the 60 dBu coverage contour and the outer is the WWPH 40 dBu F(50:10) interfering contour. The WWPH 40 dBu contour does not overlap the coverage contour of the proposed channel 300A allotment, and causes no predicted interference to the proposed allotment. The WWPH contour is contained within the proposed channel 300A allotment's 40 dBu interfering contour, hence WWPH will receive interference from this allotment, limiting the WWPH interference-free coverage to a value greater than the normally accepted 60 dBu F(50:50) contour.

This statement was prepared by Alfred E. Resnick, P. E. My education and experience are a matter of record with the Federal Communications Commission.

Alfred E. Resnick, P. E.  
February 25, 2003

